

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LIZ J. CASILLAS RODRIGUEZ

DEBTOR(S)

CASE NO 09-07858-MCF

CHAPTER 13

MOTION AND NOTICE OF FILING OF POST-CONFIRMATION  
MODIFICATION OF CHAPTER 13 PLAN

TO THE HONORABLE COURT:

NOW COMES, LIZ J. CASILLAS RODRIGUEZ, through the undersigned attorney, and very respectfully states and prays as follows:

1. Debtor is hereby submitting a Post-confirmation Modification of Chapter 13 Plan, dated August 7, 2012, herewith and attached to this motion.
2. This post-confirmation Modification of Chapter 13 Plan is filed to increase the Plan base to cure the "insufficiently funded".

NOTICE

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtor, Liz J. Casillas Rodriguez; and to all creditors and parties in interest in the present case.

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Case no. 09-07858-MCF

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 7<sup>th</sup> day of August, 2012.

*/s/ Roberto Figueroa-Carrasquillo*

ROBERTO FIGUEROA CARRASQUILLO  
USDC #203614  
ATTORNEY FOR PETITIONER  
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IN RE:

CASILLAS RODRIGUEZ, LIZ JANICE

Debtor(s)

Case No. 09-07858-13

Chapter 13

### CHAPTER 13 PAYMENT PLAN

- The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee  directly  by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
- The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: <u>8/07/2012</u>		<input type="checkbox"/> AMENDED PLAN DATED: _____ Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other																																																																		
<b>I. PAYMENT PLAN SCHEDULE</b>  <table border="1"> <tr><td>\$</td><td><u>150.00</u></td><td>x</td><td><u>35</u></td><td>= \$</td><td><u>5,250.00</u></td></tr> <tr><td>\$</td><td><u>786.00</u></td><td>x</td><td><u>25</u></td><td>= \$</td><td><u>19,650.00</u></td></tr> <tr><td>\$</td><td></td><td>x</td><td></td><td>= \$</td><td></td></tr> <tr><td>\$</td><td></td><td>x</td><td></td><td>= \$</td><td></td></tr> <tr><td>\$</td><td></td><td>x</td><td></td><td>= \$</td><td></td></tr> </table> <b>TOTAL: \$ <u>24,900.00</u></b>		\$	<u>150.00</u>	x	<u>35</u>	= \$	<u>5,250.00</u>	\$	<u>786.00</u>	x	<u>25</u>	= \$	<u>19,650.00</u>	\$		x		= \$		\$		x		= \$		\$		x		= \$		<b>II. DISBURSEMENT SCHEDULE</b>  A. ADEQUATE PROTECTION PAYMENTS OR \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: <table border="1"> <tr><td>Cr. <u>DORAL FINANCIAL</u></td><td>Cr. _____</td><td>Cr. _____</td></tr> <tr><td># <u>8930030057713</u></td><td># _____</td><td># _____</td></tr> <tr><td>\$ <u>435.00</u></td><td>\$ _____</td><td>\$ _____</td></tr> </table> 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: <table border="1"> <tr><td>Cr. _____</td><td>Cr. _____</td><td>Cr. _____</td></tr> <tr><td># _____</td><td># _____</td><td># _____</td></tr> <tr><td>\$ _____</td><td>\$ _____</td><td>\$ _____</td></tr> </table> 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: <table border="1"> <tr><td>Cr. _____</td><td>Cr. _____</td><td>Cr. _____</td></tr> <tr><td># _____</td><td># _____</td><td># _____</td></tr> <tr><td>\$ _____</td><td>\$ _____</td><td>\$ _____</td></tr> </table> 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:  5. <input type="checkbox"/> Other:  6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <u>PENTAGON FEDERAL DORAL FINANCIAL</u> C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ <table border="1"> <tr><td>Cr. _____</td><td>Cr. _____</td><td>Cr. _____</td></tr> <tr><td># _____</td><td># _____</td><td># _____</td></tr> <tr><td>\$ _____</td><td>\$ _____</td><td>\$ _____</td></tr> </table> 2. Unsecured Claims otherwise receive PRO-RATA disbursements.  OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) *Or as otherwise specified on proof of claim. Late filed claims filed by creditors will receive no distribution. "Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank. Debtor reserves the right to object claims after plan confirmation.	Cr. <u>DORAL FINANCIAL</u>	Cr. _____	Cr. _____	# <u>8930030057713</u>	# _____	# _____	\$ <u>435.00</u>	\$ _____	\$ _____	Cr. _____	Cr. _____	Cr. _____	# _____	# _____	# _____	\$ _____	\$ _____	\$ _____	Cr. _____	Cr. _____	Cr. _____	# _____	# _____	# _____	\$ _____	\$ _____	\$ _____	Cr. _____	Cr. _____	Cr. _____	# _____	# _____	# _____	\$ _____	\$ _____	\$ _____
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<b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)  Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,654.00</u>		 Signed: _____ Debtor  Joint Debtor																																																																		

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